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6 *Special Insurance Counsel to*  
7 *The Official Committee of Unsecured Creditors*

8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

Case No. 23-30564

Chapter 11

11 *In re:*

12 THE ROMAN CATHOLIC ARCHBISHOP  
13 OF SAN FRANCISCO,

14 Debtor and Debtor in Possession.

**COVER SHEET TO FIRST INTERIM FEE  
APPLICATION OF BURNS BAIR LLP AS  
SPECIAL INSURANCE COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR ALLOWANCE AND  
PAYMENT OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD OF OCTOBER 19, 2023  
THROUGH JANUARY 31, 2024**

Judge: Hon. Dennis Montali

Date: April 4, 2024

Time: 1:30 p.m. (Pacific Time)

Objection Deadline: March 21, 2024

Place: United States Bankruptcy Court

450 Golden Gate Avenue

San Francisco, California 94102

1	Name of Applicant:	Burns Bair LLP
2	Name of Client:	The Official Committee of Unsecured Creditors
3	Time period covered by this application:	October 19, 2023 – January 31, 2024
4	Total compensation sought this period:	\$105,927.00 <sup>1</sup>
5	Total expenses sought this period:	\$2,527.46
6	Petition date:	August 21, 2023
7	Retention date:	October 19, 2023
8	Date of Order approving employment:	November 29, 2023
9	Total compensation allowed by interim order to date:	N/A
10	Total expenses allowed by interim order to date:	N/A
11	Total compensation approved by interim order to date:	N/A
12	Total expenses approved by interim order to date:	N/A
13	Blended rate in the Interim Application for all attorneys:	\$775.09
14	Blended rate in the Interim Application for all timekeepers:	\$738.68
15	Fees sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$88,613.06
16	Expenses sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$2,527.46
17	If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
18	If applicable, difference between fees budgeted and compensation sought for this period:	N/A
19	Number of professionals included in this application:	7
20	Number of professionals billing fewer than 15 hours to the case during this period:	4
21	Are any rates higher than those approved or disclosed at retention?	No
22	Interim or Final:	Interim

<sup>1</sup> The compensation amount reflects a reduction of \$1680 to account for two time entries on Burns Bair's monthly fee statement for October and November time, which, due to an inadvertent clerical error, incorrectly listed Mr. Burns' time as 1 hour for each of the relevant entries, when the correct time should have been .2 hours and .3 hours, respectively. *See* entries for November 12 and November 20.

## SUMMARY OF MONTHLY FEE STATEMENTS

Date Filed & Docket	Period Covered	Total Compensation and Expenses Incurred		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date	
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees (80%)	Expenses (100%)
12/19/2023 [Dkt. 382]	10/19/2023 - 11/30/2023	\$63,528.00 <sup>2</sup>	\$1,822.16	\$52,166.40	\$1,822.16	\$52,166.40	\$1,822.16
1/19/2024 [Dkt. 432]	12/1/2023 - 12/31/2023	\$31,591.00	\$656.00	\$25,272.80	\$656.00	\$25,272.80	\$656.00
2/15/2024 [Dkt. 477]	1/1/2024 - 1/31/2024	\$10,808.00	\$49.30	\$8,646.40	\$49.30	\$8,646.40	\$49.30

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Fee Application Not Yet Paid: \$19,841.40

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<sup>2</sup> As noted earlier, the firm is reducing its fees sought in its first monthly fee statement by \$1680 to account for two time entries which, due to an inadvertent clerical error, incorrectly listed Mr. Burns' time as 1 hour for each of the relevant entries, when the correct time should have been .2 hours and .3 hours, respectively. See entries for November 12 and November 20. The applicable charts in this application have been amended throughout to adjust for the reduced hours worked and compensation sought.

TIMOTHY W. BURNS (*admitted pro hac vice*)

Wisconsin Bar #1068086

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Wisconsin Bar #1083779

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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Case No. 23-30564

Chapter 11

*In re:*

THE ROMAN CATHOLIC ARCHBISHOP  
OF SAN FRANCISCO,

Debtor and Debtor in Possession.

**FIRST INTERIM FEE APPLICATION OF  
BURNS BAIR LLP AS SPECIAL  
INSURANCE COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR ALLOWANCE AND  
PAYMENT OF COMPENSATION AND  
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THE PERIOD OF OCTOBER 19, 2023  
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Judge: Hon. Dennis Montali

Date: April 4, 2024

Time: 1:30 p.m. (Pacific Time)

Objection Deadline: March 21, 2024

Place: United States Bankruptcy Court

450 Golden Gate Avenue

San Francisco, California 94102

Burns Bair LLP (the “**Applicant**” or “**Burns Bair**”), special insurance counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) of the Roman Catholic Archbishop of San Francisco (the “**Debtor**”) in the above captioned chapter 11 case (the “**Chapter 11 Case**”) hereby submits its First Interim Fee Application (the “**Interim Application**”), for an order, in substantially the form attached hereto as **Exhibit A**, pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the United States

Trustee Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013 (the “**U.S. Trustee Guidelines**”), the *Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees* (the “**Northern District Guidelines**”), and the Local Bankruptcy Rules for the Northern District of California (the “**Local Rules**”), and the *Order Establishing Procedures and Authorizing Payment of Professional Fees and Expenses on a Monthly Basis* (the “**Interim Compensation Order**”) [Dkt. No. 212] entered by the Court on October 16, 2023, for interim approval and allowance of (i) compensation for professional services rendered to the Committee from October 19, 2023 through and including January 31, 2024 (the “**Interim Fee Period**”) and (ii) reimbursement of expenses incurred in connection with such services; and, in support thereof, respectfully represents as follows:

#### **PRELIMINARY STATEMENT**

1. Since Burns Bair’s retention by the Committee on October 19, 2023, Burns Bair has been actively engaged in all aspects of the case with the goal of maximizing insurance recoveries to unsecured creditors of the Debtor. Upon its retention, Burns Bair reviewed and analyzed the Debtor’s historical insurance policy materials, assessed and negotiated resolution of certain insurance-related lift-stay motions, presented to the Committee on case insurance issues, and began to develop the Committee’s overall insurance strategy, among other time-sensitive tasks.

2. These efforts have required Burns Bair to work closely with the Committee and its lead counsel to keep the Committee informed throughout this Chapter 11 Case. Burns Bair has also worked with the Debtor and its professional advisors, always with the goal of maximizing insurance returns for the unsecured creditors.

3. The Interim Application is based upon the points and authorities cited herein, the Certification of Jesse J. Bair, filed concurrently herewith, the exhibits attached thereto, the pleadings, papers, and records on file in this case, and any evidence or argument that the Court may entertain at the time of the hearing on the Interim Application.

1 **JURISDICTION**

2 4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. sections  
3 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges,  
4 General Order 24 (N.D. Cal.), and Rule 5011-1(a) of the Local Rules. This is a core proceeding  
5 pursuant to 28 U.S.C. section 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C.  
6 sections 1408 and 1409.

7 **CASE BACKGROUND AND STATUS**

8 **A. Debtor's Bankruptcy Proceedings**

9 5. The Debtor filed a voluntary petition for relief under Chapter 11 of the  
10 Bankruptcy Code on August 21, 2023 (the "**Petition Date**"). The Debtor continues to operate  
11 its business and manages its properties as a debtor in possession pursuant to sections 1107(a)  
12 and 1108 of the Bankruptcy Code. As of the date of filing of this Interim Application, no trustee  
13 or examiner has been appointed in this Chapter 11 Case. To date, the Debtor has not filed a plan  
14 or disclosure statement, and the Applicant does not know when the Debtor anticipates filing one.

15 **B. Selection of the Committee**

16 6. On September 1, 2023, pursuant to Section 1102 of the Bankruptcy Code, the  
17 Office of the United States Trustee (the "**U.S. Trustee**") selected interested creditors to serve on  
18 the Committee. Pursuant to section 1102(a)(1) of the Bankruptcy Code, the U.S. Trustee  
19 appointed nine members to serve on the Committee. On September 14, 2023, the Committee  
20 selected Pachulski Stang Ziehl & Jones LLP as its lead counsel. On October 19, 2023, the  
21 Committee selected Burns Bair LLP as special insurance counsel.

22 **C. The Committee's Retention of Burns Bair**

23 7. On November 29, 2023, the Court entered the *Order Approving Application of*  
24 *the Official Committee of Unsecured Creditors for Order Approving Employment of Burns Bair*  
25 *LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors*, effective  
26 October 19, 2023 [Dkt. No. 348] (the "**Retention Order**"). The Retention Order authorizes  
27 compensation and reimbursement to Burns Bair in accordance with the Bankruptcy Code, the  
28 Bankruptcy Rules, the Northern District Guidelines, the Local Rules, and the Interim

1 Compensation Order. Subject to Burns Bair's application to the Court, the Debtor is authorized  
2 by the Retention Order to compensate Burns Bair at its standard hourly rates for services  
3 performed and to reimburse it for actual and necessary expenses incurred. The Retention Order  
4 authorizes Burns Bair to provide the following services to the Committee: (1) analyze,  
5 investigate, and assess the availability of coverage under the Debtor's insurance policies; (2)  
6 represent the Committee in any adversary proceedings by and between the Debtor and its  
7 insurers; (3) engage in potential mediation and/or other resolution of the claims, demands, and/or  
8 lawsuits related to the Debtor's insurance policies; (4) advise, negotiate, and advocate on behalf  
9 of the Committee with respect to the Debtor's insurance policies; and (5) provide related advice  
10 and assistance to the Committee as necessary [Dkt No. 323].

11 **D. Summary of Professional Compensation and Reimbursement of Expenses**  
12 **Requested**

13 8. By this Interim Application, the Applicant seeks interim allowance of  
14 compensation in the amount of **\$105,927.00** and actual and necessary expenses in the amount of  
15 **\$2,527.46** for a total allowance of **\$108,454.46** for the Interim Fee Period.

16 9. All services for which Burns Bair requests compensation were performed for or  
17 on behalf of the Committee. Burns Bair has received no promises of payment from any source  
18 other than the Debtor for services rendered or to be rendered in any capacity whatsoever in  
19 connection with the matters covered by this Interim Application.

20 10. There is no agreement or understanding between Burns Bair and any other person  
21 other than the partners of Burns Bair for the sharing of compensation to be received for services  
22 rendered in this Chapter 11 Case. In connection with the Chapter 11 Case, as of this date Burns  
23 Bair has been paid **\$88,613.06** in fees and **\$2,527.46** in expenses.

24 11. Burns Bair has billed the Committee in accordance with its existing billing rates  
25 and procedures in effect during the Interim Fee Period. These rates are the same rates Burns  
26 Bair charges for services rendered by its attorneys and paraprofessionals in comparable matters  
27 and are reasonable given the compensation charged by comparably skilled practitioners in  
28 similar matters in both the California and national markets. The Summary Sheet filed herewith  
contains tables listing the Burns Bair attorneys and paraprofessionals who have performed

1 services for the Committee during the Interim Fee Period, including their job titles, hourly rates,  
2 aggregate number of hours worked in this matter, and, for attorneys, the year in which each  
3 professional was licensed to practice law. Exhibit D also contains a table summarizing the hours  
4 worked by the Firm's attorneys and paraprofessionals broken down by project billing code.  
5 Burns Bair maintains computerized time records, which have been filed on the docket with the  
6 Firm's monthly fee statements and furnished to the Committee, the Debtor, and the U.S. Trustee  
7 in the format specified by the Interim Compensation Order and are attached hereto as Exhibit F.  
8 The Committee has reviewed and approved on a monthly basis the fees and expenses requested  
9 herein.

10 12. To the extent that time or disbursement charges for services rendered or  
11 disbursements incurred relate to the Interim Fee Period but were not processed prior to the  
12 preparation of this Application, Burns Bair reserves the right to request additional compensation  
13 for such services and reimbursement of such expenses in a future application.

14 **SUMMARY OF SERVICES PERFORMED**  
15 **BY BURNS BAIR DURING THE INTERIM FEE PERIOD**

16 13. During the Interim Fee Period, Burns Bair professionals expended 143.4 hours  
17 on behalf of the Committee. Of this, 65.9 hours were expended by Burns Bair partners, 65.5 by  
18 Burns Bair associates, and 12.0 by paraprofessionals. In accordance with the Interim  
19 Compensation Order, the Northern District Guidelines, the U.S. Trustee Guidelines, and the  
20 Local Rules, Burns Bair has classified services performed into four specific categories set forth  
21 below. Burns Bair has attempted to place the services provided in the category that best relates  
22 to such services; because certain services may relate to one or more categories, however, services  
23 pertaining to one category may in fact be included in another category. The following summary  
24 of services rendered during the Interim Fee Period is not intended to be a detailed description of  
25 the work performed. Rather, it merely highlights certain project billing categories in which  
26 significant services were rendered by Burns Bair, as well as identifies some of the issues Burns  
27 Bair was required to address.



**A. Committee Meetings**  
**Fees: \$16,232.00; Total Hours: 16.3**

14. During the Interim Fee Period, Burns Bair attorneys attended Committee meetings and state court counsel meetings for the purpose of advising on case insurance issues. Meetings with the Committee and their state court counsel are a necessary aspect of Burns Bair's legal representation of the Committee.

**B. Fee Applications**  
**Fees: \$4,558.00; Total Hours: 5.6**

15. During the Interim Fee Period, Burns Bair prepared three Monthly Fee Statements for the period of October 19, 2023 through January 31, 2024: October 19, 2023 through November 30, 2023 [Dkt. No. 382], December 1, 2023 through December 31, 2023 [Dkt. No. 432], and January 1, 2024 through January 31, 2024 [Dkt. 477].

**C. Hearings**  
**Fees: \$0; Total Hours: 0**

16. During the Interim Fee Period, Burns Bair attorneys did not participate in any case hearings.

**D. Insurance Recovery Activities**  
**Fees: \$85,137.00; Total Hours: 121.5**

17. In addition to the above described tasks, during the Interim Fee Period, Burns Bair expended a considerable number of hours on behalf of the Committee performing additional insurance recovery activities including, but not limited to, participating in meet and confer sessions with the Debtor regarding case insurance issues; drafting insurance discovery requests to the Debtor; detailed review and analysis of the Debtor's historical insurance materials, including drafting a revised Debtor coverage chart; assessed and negotiated resolution of certain insurers' motion to lift the stay to proceed with their state court coverage lawsuit against the Debtor, including associated legal research and assessment of various issues concerning abstention, removal, jurisdiction, and the procedural mechanics for converting the current coverage action into a global lawsuit involving all of the Debtor's insurers; drafted the Committee's joinder in opposition to certain insurers' lift stay motion; assessed and negotiated resolution of lift-stay motion filed by non-abuse personal injury claimant, including analysis of

1 relevant Debtor insurance policies to ensure that prosecution of lawsuit would not deplete  
2 available insurance for abuse survivors; analyzed insurance issues in connection with the Proof  
3 of Claim form; and began formulating overall insurance strategy on behalf of the Committee,  
4 including consideration of mediation issues, Plan structure, and potential test cases and/or  
5 insurance demands. These tasks are not meant to be a detailed description of all work performed.

#### 6 **ACTUAL AND NECESSARY DISBURSEMENTS**

7 18. During the Interim Fee Period, Burns Bair incurred a total of **\$2,527.46** in  
8 expenses. These expenses relate primarily to travel in connection with an in-person Committee  
9 meeting, as well as payment for court fees. These expenses are reasonable and necessary for the  
10 administration of the Chapter 11 Case.

#### 11 **LEGAL BASIS FOR INTERIM COMPENSATION**

12 19. The professional services for which Burns Bair requests interim allowance of  
13 compensation and reimbursement of expenses were rendered and incurred in connection with  
14 this case in the discharge of Burns Bair's professional responsibilities as special insurance  
15 counsel for the Committee in this Chapter 11 Case. Burns Bair's services have been necessary  
16 and beneficial to the Committee, the Debtor, its estate, creditors, and other parties of interest.

17 20. In accordance with the factors enumerated in section 330 of the Bankruptcy Code,  
18 Burns Bair respectfully submits that the amount requested by Burns Bair is fair and reasonable  
19 given the complexity of the Chapter 11 Case, the time expended, the nature and extent of the  
20 services rendered, the value of such services, and the costs of comparable services other than in  
21 a case under the Bankruptcy Code. Moreover, Burns Bair has reviewed the requirements of the  
22 Interim Compensation Order, the Northern District Guidelines, and the UST Guidelines and  
23 believes that the Interim Application complies with all of them.

#### 24 **COMPLIANCE WITH LARGE CASE REQUIREMENTS**

25 21. Charts and tables based on such forms, and certain other exhibits, are attached  
26 and filled out with data to the extent relevant to this Chapter 11 Case:

27 **Exhibit B:** Customary and Comparable Compensation Disclosures with Fee  
28 Applications;

**Exhibit C:** Summary of Timekeepers in this Application;

**Exhibit D:** Summary of Compensation by Project Category;

**Exhibit E:** Summary of Expense Reimbursement; and

**Exhibit F:** Detailed records for the Compensation Period.

22. Pursuant to paragraph C.5 of the Large Case Guidelines, Burns Bair provides the following statements:

Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	No.
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A.
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No.
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.	No. Any time worked on these tasks would have been in connection with preparing monthly fee statements.
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.	No.
If the fee application includes any rate increases since retention: i. Did your client review and approve those rate increases in advance? ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?	N/A

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Respectfully submitted,

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**EXHIBIT A**

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12 *The Official Committee of Unsecured Creditors*

13 **UNITED STATES BANKRUPTCY COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 Case No. 23-30564

17 Chapter 11

18 *In re:*

19 THE ROMAN CATHOLIC ARCHBISHOP  
20 OF SAN FRANCISCO,

21 Debtor and Debtor in Possession.

**ORDER GRANTING FIRST INTERIM FEE  
APPLICATION OF BURNS BAIR LLP AS  
SPECIAL INSURANCE COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR ALLOWANCE AND  
PAYMENT OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD OF OCTOBER 19, 2023  
THROUGH JANUARY 31, 2024**

Judge: Hon. Dennis Montali

Date: April 4, 2024

Time: 1:30 p.m. (Pacific Time)

Objection Deadline: March 21, 2024

Place: United States Bankruptcy Court

450 Golden Gate Avenue

San Francisco, California 94102

22 Upon consideration of the *First Interim Fee Application of Burns Bair LLP as Special*  
23 *Insurance Counsel to the Official Committee of Unsecured Creditors for Allowance and Payment*  
24 *of Compensation and Reimbursement of Expenses for the Period of October 19, 2023 through*  
25 *January 31, 2024* (the “**Interim Application**”);<sup>3</sup> and this Court having jurisdiction to consider  
26 the Interim Application and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334,

27 \_\_\_\_\_  
28 <sup>3</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Interim Application.

1 the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order  
2 24 (N.D. Cal) and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District  
3 Court for the Northern District of California; and consideration of the Interim Application and  
4 the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being  
5 proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of  
6 the Interim Application having been provided to the parties listed therein, and it appearing that  
7 no other or further notice need be provided; and this Court having reviewed the Interim  
8 Application of Burns Bair; and, upon the record and all of the proceedings had before the Court;  
9 and this Court having found and determined that the relief sought in the Interim Application is  
10 in the best interests of the Debtor, its estate, creditors, and all parties in interest; and that the legal  
11 and factual bases set forth in the Interim Application establish just cause for the relief granted  
12 herein; and after due deliberation and sufficient cause appearing therefor,

13 **IT IS HEREBY ORDERED THAT:**

- 14 1. The Interim Application is granted as provided herein.
- 15 2. Burns Bair is awarded an interim allowance of its compensation for professional  
16 services rendered in the amount of \$108,454.46 consisting of \$105,927.00 of fees and  
17 reimbursement of \$2,527.46 of actual and necessary expenses incurred during the Interim Fee  
18 Period.
- 19 3. The Debtor is directed to pay Burns Bair the amount allowed in paragraph 2  
20 above.
- 21 4. The Court shall retain jurisdiction to determine any controversy arising in  
22 connection with this Order.

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24 \*\* END OF ORDER \*\*  
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**Court Service List**

*All registered ECF participants.*



## **EXHIBIT B**

### **Customary and Comparable Disclosures with Fee Applications**

**Privacy Act Statement.** 28 U.S.C. § 586(a)(3)(A) authorizes the collection of this information. The United States Trustee will use the information contained in this form to evaluate whether compensation and reimbursement of expenses filed by attorneys in larger chapter 11 cases - those cases with \$50 million or more in assets and \$50 million or more in liabilities - are appropriate and reasonable pursuant to 11 U.S.C. § 330. Disclosure of this information may be to a bankruptcy trustee or examiner when the information is needed to perform the trustee's or examiner's duties, or to the appropriate federal, state, local, regulatory, tribal, or foreign law enforcement agency when the information indicates a violation or potential violation of law. Other disclosures may be made for routine purposes. For a discussion of the types of routine disclosures that may be made, you may consult the Executive Office for United States Trustee's systems of records notice, UST-001, "Bankruptcy Case Files and Associated Records." See 71 Fed. Reg. 59,818 et seq. (Oct. 11, 2006). A copy of the notice may be obtained at the following link: <https://www.gpo.gov/fdsys/pkg/FR-2006-10-11/pdf/E6-16814.pdf>.

Failure to provide this information could result in an objection to your fee application, or other action by the United States Trustee. 11 U.S.C. § 330.

(See Guidelines ¶ C.3. for definitions of terms used in this Exhibit.)

Category of Timekeeper	Blended Hourly Rate	
	BILLED <sup>4</sup> Firm for proceeding year, excluding bankruptcy	BILLED In the Interim Fee Period
Partner	\$1,010.28	\$998.82
Associate	\$511.02	\$550.00
Paralegal	\$361.32	\$340.00
All Timekeepers Aggregated	\$631.00	\$738.68

Case Name: Roman Catholic Archbishop of San Francisco  
Case Number: 23-BK-30564  
Applicant's Name: Burns Bair LLP  
Date of Application: February 29, 2024  
Interim or Final: Interim

<sup>4</sup> In addition to traditional hourly matters, Burns Bair also worked on contingent cases where hours are tracked each month, but not billed to the client.

## **EXHIBIT C**

### **Summary of Timekeepers Included in this Interim Fee Application**

<b>NAME OF PROFESSIONAL:</b>	<b>POSITION</b>	<b>YEAR ADMITTED</b>	<b>HOURLY RATE</b>	<b>TOTAL HOURS</b>	<b>TOAL FEES</b>
Timothy W. Burns	Partner	1991	\$1,120.00	29.60	\$33,152.00
Jesse J. Bair	Partner	2013	\$900.00	36.30	\$32,670.00
Nathan M. Kuenzi	Associate	2020	\$550.00	4.40	\$2,420.00
Brian P. Cawley	Associate	2020	\$550.00	61.10	\$33,605.00
Brenda Horn-Edwards	Paralegal	N/A	\$340.00	.90	\$306.00
Karen Dempski	Paralegal	N/A	\$340.00	2.80	\$952.00
Alyssa Turgeon	Paralegal	N/A	\$340.00	8.30	\$2,822.00
<b>Total:</b>				<b>143.4</b>	<b>\$105,927.00</b>

**EXHIBIT D**

**Summary of Compensation Requested by Category**

<b>Category</b>	<b>Hours Billed this Fee Period</b>	<b>Total for Fee Statement</b>
Committee Meetings	16.3	\$16,232.00
Fee Applications	5.6	\$4,558.00
Hearings	0	\$0
Insurance Recovery Activities	121.5	\$85,137.00
<b>Total:</b>	<b>143.4</b>	<b>\$105,927.00</b>

**EXHIBIT E**

**Summary of Expense Reimbursement**

<b>Expense Category</b>	<b>Total Expenses</b>
Court Fees	\$656.00
PACER	\$49.30
Travel (flights, taxi, hotels, meals, parking)	\$1,822.16
<b>TOTAL:</b>	<b>\$2,527.46</b>

**EXHIBIT F**

**Burns Bair LLP Invoices**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
Archbishop of San Francisco**

**Issue Date :** 12/11/2023

**Bill # :** 01323

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/23/2023	Jesse Bair	Correspond with B. Michael re in-person Committee meeting (.1);	0.10	\$90.00
10/26/2023	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re case status, strategy, and next steps (1.0);	1.00	\$900.00
10/26/2023	Timothy Burns	Participate in Committee meeting for insurance purposes re case status, strategy, and next steps (1.4);	1.40	\$1,568.00
11/5/2023	Jesse Bair	Correspondence with B. Michael re upcoming in-person Committee meeting (.1);	0.10	\$90.00
11/7/2023	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case status and strategy (1.0);	1.00	\$1,120.00
11/7/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case status and strategy (1.0);	1.00	\$900.00
11/12/2023	Timothy Burns	Participate in conference with PSZJ re in-person Committee meeting (.5);	0.50	\$560.00
11/12/2023	Timothy Burns	Participate in in-person Committee meeting for insurance purposes re case overview, strategy and next-steps (3.2);	3.20	\$3,584.00
11/12/2023	Jesse Bair	Participate in in-person Committee meeting for insurance purposes re case overview, strategy and next-steps (3.2);	3.20	\$2,880.00
11/12/2023	Timothy Burns	Participate in conference with state court counsel re in-person Committee meeting (.2);	1.00	\$1,120.00
11/12/2023	Jesse Bair	Participate in conference with T. Burns re upcoming, in person Committee meeting (.2); participate in conference with T. Burns and state court counsel re same (.2);	0.40	\$360.00

11/12/2023	Timothy Burns	Participate in conference with J. Bair re upcoming, in person Committee meeting (.2);	0.20	\$224.00
11/18/2023	Jesse Bair	Review agenda for upcoming state court counsel meeting (.1);	0.10	\$90.00
11/27/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case developments and next-steps (1.1);	1.10	\$990.00
11/27/2023	Jesse Bair	Participate in post-state court counsel meeting with T. Burns re outcome of meeting and case next-steps (.2);	0.20	\$180.00
11/27/2023	Timothy Burns	Participate in conference with J. Bair re outcome of state court counsel meeting and case next-steps (.2);	0.20	\$224.00
11/27/2023	Jesse Bair	Review agenda and prepare for state court counsel meeting (.1);	0.10	\$90.00
<b>Totals for Committee Meetings</b>			<b>14.80</b>	<b>\$14,970.00</b>

#### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
<b>Totals for Fee Applications</b>			<b>0.0</b>	<b>\$0.00</b>

#### Insurance Adversary Proceeding

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/20/2023	Brian Cawley	Draft revised insurance discovery requests to the Debtor (.8);	0.80	\$440.00
10/20/2023	Brian Cawley	Participate in conference with T. Burns re insurance document requests to the Debtor (.4);	0.40	\$220.00
10/20/2023	Timothy Burns	Review and respond to correspondence with PSZJ re insurance document requests to the Debtor (.2);	0.20	\$224.00
10/20/2023	Timothy Burns	Review and edit insurance document requests to the Debtor (.6);	0.60	\$672.00
10/20/2023	Timothy Burns	Participate in conference with B. Cawley re insurance document requests to the Debtor (.4);	0.40	\$448.00
10/23/2023	Jesse Bair	Review and consider draft insurance document requests to the Debtor (.2);	0.20	\$180.00
10/28/2023	Timothy Burns	Participate in call with J. Stang re certain insurers' motion to lift stay (.2); brief review of the insurers' lift stay papers (.2);	0.40	\$448.00
10/28/2023	Timothy Burns	Correspond with the Debtor re Debtor insurance information (.1);	0.10	\$112.00
10/28/2023	Timothy Burns	Participate in call with J. Bair re insurance status and strategy, including the insurers' lift stay motion of the state court coverage action (.2);	0.20	\$224.00

10/28/2023	Jesse Bair	Participate in call with T. Burns re insurance status and strategy, including the insurers' lift stay motion of the state court coverage action (.2); review correspondence with T. Burns, J. Stang, and the Debtor re same (.1);	0.30	\$270.00
10/29/2023	Nathan Kuenzi	Review correspondence and attached materials from J. Bair re drafting Burns Bair retention application (.4);	0.40	\$220.00
10/29/2023	Jesse Bair	Correspondence with B. Michael re Burns Bair retention application (.1); correspondence with B. Horn and N. Kuenzi re drafting same (.1);	0.20	\$180.00
10/30/2023	Jesse Bair	Participate in conference with B. Michael, J. Stang, and T. Burns re insurance proof of claim form issues (.3);	0.30	\$270.00
10/30/2023	Timothy Burns	Conference with B. Cawley re the insurers' motion for relief from stay (.1);	0.10	\$112.00
10/30/2023	Brian Cawley	Draft summary memo re recent Committee meeting for T. Burns (.3); participate in conference with T. Burns re the insurers' motion for relief from stay (.1);	0.40	\$220.00
10/30/2023	Timothy Burns	Participate in call PSZJ and J. Bair re insurance proof of claim form issues (.3);	0.30	\$336.00
10/30/2023	Timothy Burns	Begin preparing for upcoming in-person Committee meeting (.3);	0.30	\$336.00
10/30/2023	Jesse Bair	Participate in call with the Debtor and T. Burns re case insurance issues, including the insurers' motion to lift the stay on the state court insurance action (.4);	0.40	\$360.00
10/30/2023	Nathan Kuenzi	Begin drafting Burns Bair retention application (1.1);	1.10	\$605.00
10/30/2023	Jesse Bair	Review B. Michael correspondence re case status and recent developments (.1);	0.10	\$90.00
10/30/2023	Timothy Burns	Participate in call with the Debtor and J. Bair re case insurance issues, including the insurers' motion to lift the stay on the state court insurance action (.4);	0.40	\$448.00
10/31/2023	Timothy Burns	Review certain insurers' motion for relief from stay briefing and related attachments (1.7);	1.70	\$1,904.00
10/31/2023	Nathan Kuenzi	Correspondence with J. Bair re drafting Burns Bair retention application (.1);	0.10	\$55.00
10/31/2023	Timothy Burns	Conference with J. Bair re certain insurers' motion for relief from stay (.2);	0.20	\$224.00
10/31/2023	Timothy Burns	Review Castro personal injury claimant motion for relief from stay (.3);	0.30	\$336.00
10/31/2023	Jesse Bair	Conference with T. Burns re certain insurers' motion for relief from stay (.2);	0.20	\$180.00
10/31/2023	Jesse Bair	Correspond with N. Kuenzi re drafting Burns Bair retention papers (.1);	0.10	\$90.00
10/31/2023	Brian Cawley	Discuss state court coverage action research project with T. Burns (.2);	0.20	\$110.00



10/31/2023	Brian Cawley	Research and analyze details re certain insurers' state court coverage action against the Debtor, including judge overseeing same (1.0);	1.00	\$550.00
10/31/2023	Alyssa Turgeon	Identify and obtain relevant pleadings from certain insurers' state court action against the Debtor (0.5);	0.50	\$170.00
10/31/2023	Timothy Burns	Review correspondence re proof of claim issues (.1);	0.10	\$112.00
10/31/2023	Nathan Kuenzi	Finish drafting Burns Bair retention application and related exhibits (2.4);	2.40	\$1,320.00
10/31/2023	Timothy Burns	Conference with B. Cawley re research assignments re lift stay briefing (.2);	0.20	\$224.00
10/31/2023	Timothy Burns	Review correspondence re Committee and state court counsel meetings (.1);	0.10	\$112.00
11/1/2023	Jesse Bair	Review B. Michael correspondence re weekly team meeting (.1);	0.10	\$90.00
11/2/2023	Jesse Bair	Prepare for call with the Debtor re case insurance issues (.2);	0.20	\$180.00
11/2/2023	Jesse Bair	Preliminary review re Burns Bair retention application (.1); provide instructions to N. Kuenzi re additional edits needed to same (.1);	0.20	\$180.00
11/2/2023	Jesse Bair	Participate in call with the Debtor re case insurance issues (.5);	0.50	\$450.00
11/2/2023	Nathan Kuenzi	Participate in conference with J. Bair re additional edits needed to Burns Bair retention application (.1);	0.10	\$55.00
11/2/2023	Nathan Kuenzi	Draft revisions to Burns Bair retention application documents (.3);	0.30	\$165.00
11/3/2023	Timothy Burns	Participate in call with certain insurers re their motion for relief from stay (.3);	0.30	\$336.00
11/3/2023	Jesse Bair	Participate in conference with T. Burns re outcome of call with certain insurers' counsel re lift stay issues (.1);	0.10	\$90.00
11/3/2023	Timothy Burns	Met with J. Bair re outcome of call with debtor's insurance counsel re stay relief issues (.2);	0.20	\$224.00
11/3/2023	Jesse Bair	Participate in call with J. Stang and T. Burns re case insurance issues, strategy, and lift stay motion positions (.4);	0.40	\$360.00
11/3/2023	Timothy Burns	Participate in call with state court counsel re certain insurers' motion for relief from stay (.3);	0.30	\$336.00
11/3/2023	Jesse Bair	Review and respond to correspondence with the Debtor re insurance issues in connection with lift stay motion of non-abuse personal injury claim (.2);	0.20	\$180.00
11/3/2023	Timothy Burns	Participate in conference with J. Bair re outcome of call with state court counsel re certain insurers' motion for relief from stay (.1); participate in call with J. Stang and J. Bair re case insurance issues, strategy, and lift stay motion positions (.4);	0.50	\$560.00

11/3/2023	Jesse Bair	Participate in conference with T. Burns re outcome of insurance call with the Debtor (.2);	0.20	\$180.00
11/3/2023	Jesse Bair	Participate in conference with T. Burns re outcome of call with state court counsel re lift stay insurance issues (.1);	0.10	\$90.00
11/4/2023	Timothy Burns	Review J. Bair correspondence with Debtor re motion for relief re personal injury case and related insurance issues (.1); review correspondence with J. Bair and PSZJ re same (.1); review additional correspondence with J. Stang and Debtor re same (.1);	0.30	\$336.00
11/4/2023	Timothy Burns	Review correspondence from PSZJ re the Committee's Rule 2004 motion to debtor (.1);	0.10	\$112.00
11/4/2023	Timothy Burns	Draft internal memo re certain insurers' motion for relief from stay, potential strategy re same, and supplemental research needed in connection with same (.8);	0.80	\$896.00
11/4/2023	Brian Cawley	Analyze T. Burns memo re potential insurance lift stay strategy and related research projects (.2);	0.20	\$110.00
11/4/2023	Timothy Burns	Reviewed the insurers' limited objection to proof of claim order (.2);	0.20	\$224.00
11/4/2023	Timothy Burns	Review the Committee's limited objection to proof of claim order (.2);	0.20	\$224.00
11/4/2023	Jesse Bair	Review correspondence from Debtor insurance counsel re the personal injury lift stay motion (.1); review additional correspondence with Committee and Debtor bankruptcy counsel re same (.1);	0.20	\$180.00
11/4/2023	Timothy Burns	Review compromise language proposed by debtor re supplemental proof of claim language (.1);	0.10	\$112.00
11/4/2023	Timothy Burns	Review J. Stang correspondence with state court counsel re mediator selection (.1);	0.10	\$112.00
11/5/2023	Jesse Bair	Review and edit Burns Bair's retention application papers (.6);	0.60	\$540.00
11/5/2023	Jesse Bair	Review and respond to correspondence with PSZJ and the Debtor re Rule 2004 meet and confer (.2);	0.20	\$180.00
11/5/2023	Jesse Bair	Review correspondence with J. Stang and state court counsel re potential mediators (.1);	0.10	\$90.00
11/6/2023	Jesse Bair	Participate in conference with T. Burns re insurance case developments and next-steps (.1);	0.10	\$90.00
11/6/2023	Timothy Burns	Met with J. Bair re insurance case developments and next-steps (.1);	0.10	\$112.00
11/7/2023	Timothy Burns	Review Castro personal injury claimant relief from stay motion in connection with the Committee's position re same for insurance purposes (1.1);	1.10	\$1,232.00
11/7/2023	Jesse Bair	Correspond with K. Dempski re preparing Burns Bair pro hac vice materials (.1);	0.10	\$90.00

11/7/2023	Timothy Burns	Participate in conference with J. Bair re relief from stay issues on personal injury Castro claim (.3); review correspondence with Debtor and PSZJ re same (.2);	0.50	\$560.00
11/7/2023	Timothy Burns	Prepared response to debtor's counsel re Castro claims relief motion (.4);	0.40	\$448.00
11/7/2023	Brian Cawley	Detailed research re case law re removal and jurisdictional issues in connection with the Committee's response to certain insurers' motion to lift the stay (5.4);	5.40	\$2,970.00
11/7/2023	Jesse Bair	Review and edit T. Burns memorandum re stay relief issues in connection with personal injury claim (.2);	0.20	\$180.00
11/7/2023	Timothy Burns	Prepared draft report to state court counsel re Castro claims relief motion (.4);	0.40	\$448.00
11/7/2023	Jesse Bair	Review the Court's tentative order on POC issues (.1);	0.10	\$90.00
11/7/2023	Jesse Bair	Participate in conference with T. Burns re relief from stay issues on Castro personal injury claim (.3);	0.30	\$270.00
11/8/2023	Timothy Burns	Participate in call with the Debtor re insurance issues in connection with motions for relief from stay (.8);	0.80	\$896.00
11/8/2023	Timothy Burns	Participate in call with J. Bair re outcome of call with the Debtor re insurance issues in connection with lift stay motions (.2); participate in call with J. Stang re same and next-steps (.2); correspondence with the Debtor re Castro motion for relief from stay (.1);	0.50	\$560.00
11/8/2023	Karen DempSKI	Prepare draft pro hac vice applications for T. Burns and J. Bair (1.2);	1.20	\$408.00
11/8/2023	Jesse Bair	Review revised version of Burns Bair retention application (.1);	0.10	\$90.00
11/8/2023	Jesse Bair	Review and respond to correspondence with PSZJ re final version of the Rule 2004 discovery requests (.1); participate in call with T. Burns re outcome of call with the Debtor re insurance issues in connection with the lift stay motions (.2);	0.30	\$270.00
11/8/2023	Brian Cawley	Draft summary of research for T. Burns of removal and jurisdictional issues in connection with the Committee's response to certain insurers' motion to lift the stay (1.2);	1.20	\$660.00
11/8/2023	Jesse Bair	Analysis re B. Michael insurance questions and draft supplemental Rule 2004 insurance discovery requests (.5);	0.50	\$450.00
11/9/2023	Jesse Bair	Participate in conference with T. Burns re strategy in response to certain insurers' motion to lift the stay (.2); participate in call with T. Burns and state court counsel re same (.3);	0.50	\$450.00

11/9/2023	Brian Cawley	Research and draft memo re options for converting the current state court coverage action into a comprehensive coverage action with all insurer defendants (3.2);	3.20	\$1,760.00
11/9/2023	Jesse Bair	Review and edit Burns Bair pro hac vice applications (.2);	0.20	\$180.00
11/9/2023	Timothy Burns	Review research memo from B. Cawley re issues in connection with the insurers' motion to lift stay (.2);	0.20	\$224.00
11/10/2023	Jesse Bair	Participate in call with PSZJ and T. Burns re outcome of proof of claim hearing (.2);	0.20	\$180.00
11/10/2023	Timothy Burns	Participate in call with PSZJ and J. Bair re hearing on POC supplemental information (.2);	0.20	\$224.00
11/12/2023	Jesse Bair	Brief review of presentations for upcoming Committee meeting (.1); review B. Michael correspondence re same (.1);	0.20	\$180.00
11/13/2023	Jesse Bair	Analysis re case insurance next-steps (.1);	0.10	\$90.00
11/14/2023	Timothy Burns	Reviewed and responded to J. Bair re email from B. Michael re insurance questions re claims procedure order (.2);	0.20	\$224.00
11/14/2023	Jesse Bair	Brief review of the Debtor's draft objection to certain insurers' motion to lift the stay (.1); correspond with T. Burns re same, potential Committee joinder, and related issues (.2);	0.30	\$270.00
11/14/2023	Jesse Bair	Respond to B. Michael correspondence re the insurers' suggested edits to the claims procedure order (.2);	0.20	\$180.00
11/15/2023	Jesse Bair	Review correspondence with the Debtor re certain insurers' lift stay motion (.1);	0.10	\$90.00
11/15/2023	Timothy Burns	Review letter from the Debtor to the Court re proof of claim form (.1);	0.10	\$112.00
11/15/2023	Timothy Burns	Review and revise debtor's draft opposition to stay relief motion by certain insurers (.4); correspond with J. Bair re same (.1);	0.50	\$560.00
11/15/2023	Brian Cawley	Draft the Committee's joinder to the debtor's opposition to certain insurers' stay relief motion (.7);	0.70	\$385.00
11/15/2023	Jesse Bair	Participate in call with T. Burns re debtor's opposition to stay relief motion by insurers (.1);	0.10	\$90.00
11/15/2023	Timothy Burns	Participate in call with J. Bair re debtor's opposition to stay relief motion by insurers (.1);	0.10	\$112.00
11/15/2023	Timothy Burns	Review draft joinder to debtor's lift-stay opposition (.1); review related correspondence with J. Bair and PSZJ re same (.1);	0.20	\$224.00
11/15/2023	Jesse Bair	Draft insurance case update to the Committee (.5);	0.50	\$450.00

11/15/2023	Jesse Bair	Review and edit draft version of the Debtor's objection to certain insurers' motion to lift stay, including incorporating T. Burns' suggested edits (.2); correspondence with B. Michael re same and related insurance issues (.1);	0.30	\$270.00
11/15/2023	Timothy Burns	Review Debtor correspondence re certain insurers' lift stay motion (.1) review correspondence with PSZJ re same (.1); additional analysis re lift stay issues (.1);	0.30	\$336.00
11/15/2023	Jesse Bair	Correspondence with B. Michael and J. Stang re suggested edits to insurance update memo to the Committee (.1);	0.10	\$90.00
11/15/2023	Jesse Bair	Provide instructions to B. Cawley re drafting the Committee's joinder to the Debtor's opposition to certain insurers' motion to lift the stay (.1); review and edit initial version of same (.2);	0.30	\$270.00
11/15/2023	Timothy Burns	Review J. Bair's insurance status update to the Committee (.1);	0.10	\$112.00
11/16/2023	Jesse Bair	Review B. Cawley research memo re removal issues (.1);	0.10	\$90.00
11/16/2023	Timothy Burns	Review correspondence from PSZJ re abstention issue (.1); email research assignment to B. Cawley re same (.1);	0.20	\$224.00
11/16/2023	Jesse Bair	Analysis re potential abstention issues (.2); correspondence with PSZJ re same (.1);	0.30	\$270.00
11/16/2023	Jesse Bair	Review J. Stang correspondence re proof of claim ruling (.1);	0.10	\$90.00
11/16/2023	Jesse Bair	Review final version of the Debtor's objection to certain insurers' motion to lift the stay (.1);	0.10	\$90.00
11/16/2023	Jesse Bair	Review B. Cawley research memo re mechanics for creating comprehensive coverage action (.1);	0.10	\$90.00
11/16/2023	Brian Cawley	Correspond with T. Burns regarding abstention research project (.2);	0.20	\$110.00
11/16/2023	Timothy Burns	Assess priority of Committee insurance discovery requests (.2);	0.20	\$224.00
11/16/2023	Jesse Bair	Review T. Burns and B. Michael correspondence re priority of insurance discovery requests (.1);	0.10	\$90.00
11/17/2023	Brian Cawley	Begin analysis of potential abstention issues in connection with the Chubb coverage action (4.4);	4.40	\$2,420.00
11/17/2023	Jesse Bair	Review final version of the Committee's joinder to the Debtor's opposition to certain insurers' motion to lift the stay (.1);	0.10	\$90.00
11/17/2023	Jesse Bair	Review final version of Burns Bair retention application (.1);	0.10	\$90.00
11/17/2023	Jesse Bair	Review correspondence from the Debtor re insurance issues in connection with lifting the stay on the Castro personal injury, non-abuse claim (.1); brief review re TNCRRG policy in connection with same (.1);	0.20	\$180.00

11/20/2023	Timothy Burns	Conference with J. Bair re Castro lift stay motion (.1);	0.10	\$112.00
11/20/2023	Jesse Bair	Review B. Michael correspondence re bar date notice issue (.1);	0.10	\$90.00
11/20/2023	Timothy Burns	Met with internal BB team re case strategy, developments, and assignments (.2); met with J. Bair and B. Cawley re abstention related research (.1);	1.00	\$1,120.00
11/20/2023	Jesse Bair	Conference with T. Burns re Castro lift stay motion (.1)	0.10	\$90.00
11/20/2023	Timothy Burns	Review correspondence from B. Michael re bar date notice issues (.1);	0.10	\$112.00
11/20/2023	Brian Cawley	Begin analyzing TNCRRG policy in connection with lifting the stay on the Castro personal injury, non-abuse claim, to assess the impact, if any, on coverage for abuse claims (.9);	0.90	\$495.00
11/20/2023	Brian Cawley	Participate in BB team meeting regarding case status and assignments (.2);	0.20	\$110.00
11/20/2023	Jesse Bair	Participate in BB team meeting re case developments and ongoing insurance projects (.2);	0.20	\$180.00
11/20/2023	Brian Cawley	Continue researching abstention issues in connection with the Chubb coverage action, including focus on the home defendant rule in relation to jurisdictional issues re the Chubb coverage action (2.0);	2.00	\$1,100.00
11/20/2023	Jesse Bair	Conference with B. Cawley and T. Burns re lift stay supplemental research (.1);	0.10	\$90.00
11/21/2023	Jesse Bair	Review B. Cawley assessment of TNCRRG policy re operation of coverage limits (.1); correspondence with the Debtor re same and position on lifting of stay re the Castro personal injury action (.1);	0.20	\$180.00
11/21/2023	Brian Cawley	Continue analyzing forum defendant rule and jurisdictional issues in connection with the Chubb coverage action (1.8);	1.80	\$990.00
11/21/2023	Brian Cawley	Finish analyzing the TNCRRG policies for impact of non-abuse claims on coverage for abuse claims (1.8);	1.80	\$990.00
11/21/2023	Jesse Bair	Correspondence with the Debtor and certain insurers re adjournment of certain insurers' motion to lift the stay (.1);	0.10	\$90.00
11/21/2023	Jesse Bair	Conference with T. Burns re adjournment of hearing on certain insurers' motion to lift the stay (.1);	0.10	\$90.00
11/21/2023	Timothy Burns	Conference with J. Bair re adjournment of hearing on certain insurers' motion to lift the stay (.1);	0.10	\$112.00
11/21/2023	Brian Cawley	Draft summary of findings from TNCRRG policy review and send to J. Bair (.5);	0.50	\$275.00



11/22/2023	Jesse Bair	Review draft Order lifting the stay on the Castro personal injury action (.1); correspondence with T. Burns re same and potential edits (.1); participate in call with T. Burns re same (.1); correspondence with the Debtor re potential edits to same (.1);	0.40	\$360.00
11/22/2023	Brian Cawley	Continue detailed analysis re abstention and jurisdictional issues involving the Chubb coverage action, including assessment of snap removal application (2.6); discuss status of research with J. Bair (.1);	2.70	\$1,485.00
11/22/2023	Timothy Burns	Participate in call with J. Bair re Castro motion for relief (.1); review J. Bair correspondence re same (.1);	0.20	\$224.00
11/22/2023	Jesse Bair	Conference with B. Cawley re research needed re abstention issue (.1);	0.10	\$90.00
11/25/2023	Jesse Bair	Review notice of rescheduled hearing re certain insurers' motion to lift the stay (.1);	0.10	\$90.00
11/25/2023	Timothy Burns	Review bar date order (.2);	0.20	\$224.00
11/27/2023	Jesse Bair	Review proposed edits to the draft Castro lift stay order proposed by the Debtor re defense cost issue (.1); correspond with the Debtor re additional proposed revisions to same (.1);	0.20	\$180.00
11/27/2023	Jesse Bair	Review and consider Judge Montali's decision on test cases from the PG&E case re potential use in ASF bankruptcy (.2);	0.20	\$180.00
11/27/2023	Timothy Burns	Participate in call with particular state court counsel and J. Bair re case insurance issues (.5);	0.50	\$560.00
11/27/2023	Jesse Bair	Participate in call with particular state court counsel and T. Burns re case insurance issues (.5);	0.50	\$450.00
11/30/2023	Jesse Bair	Review the Debtor and claimant's proposed final revisions to the Castro lift stay order (.1); participate in call with T. Burns re same (.1); correspond with the Debtor re same (.1);	0.30	\$270.00
11/30/2023	Timothy Burns	Review additional proposed edits to the Castro lift stay order (.1); review correspondence with the Debtor re same (.1); correspondence with Committee professionals re same (.2); call with J. Bair re same (.1);	0.50	\$560.00
<b>Totals for Insurance Adversary Proceeding</b>			<b>65.20</b>	<b>\$50,238.00</b>

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<b>Total Hours and Fees</b>	<b>80.00</b>	<b>\$65,208.00</b>
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### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/12/2023	Taxi, T. Burns	\$75.92
11/12/2023	Delta Airlines, T. Burns (MSN-SFO)	\$406.00
11/12/2023	Hotel, T. Burns (1 night)	\$396.58
11/12/2023	Hotel, J. Bair (1 night)	\$396.58

11/12/2023	Delta Airlines, J. Bair (MSN-SFO)	\$406.00
11/13/2023	Travel meal, T. Burns	\$47.07
11/13/2023	Travel meal, J. Bair	\$15.36
11/13/2023	Travel meal, J. Bair	\$21.16
11/13/2023	Travel meal, T. Burns	\$27.49
11/17/2023	Airport parking, J. Bair	\$30.00
<b>Total Expenses</b>		<b>\$1,822.16</b>

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	Paralegal	0.50	\$340.00	\$170.00
Brian Cawley	Associate	28.00	\$550.00	\$15,400.00
Jesse Bair	Partner	20.90	\$900.00	\$18,810.00
Karen Dempski	Paralegal	1.20	\$340.00	\$408.00
Nathan Kuenzi	Associate	4.40	\$550.00	\$2,420.00
Timothy Burns	Partner	25.00	\$1,120.00	\$28,000.00

**Total Due This Invoice: \$67,030.16**



# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
Archbishop of San Francisco**

**Issue Date :** 1/10/2024

**Bill # :** 01334

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/12/2023	Jesse Bair	Prepare for state court counsel meeting (.1); participate in state court counsel meeting for insurance purposes re case developments and next-steps (.4);	0.50	\$450.00
12/12/2023	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case developments and next-steps (.4);	0.40	\$448.00
<b>Totals for Committee Meetings</b>			<b>0.90</b>	<b>\$898.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/7/2023	Jesse Bair	Begin reviewing and editing Burns Bair invoice for inclusion with monthly fee submission (1.2);	1.20	\$1,080.00
12/11/2023	Jesse Bair	Continue reviewing and editing Burns Bair invoices for October and November time for inclusion in monthly fee submission (1.0);	1.00	\$900.00
12/11/2023	Jesse Bair	Correspondence with G. Brown and the Committee re Burns Bair's first monthly fee submission (.1);	0.10	\$90.00
12/14/2023	Karen Dempksi	Draft Burns Bair monthly fee application (.4); correspondence with J. Bair re same (.1);	0.50	\$170.00
12/14/2023	Jesse Bair	Review and edit Burns Bair's first monthly fee submission (.2); correspondence with G. Brown re same (.1);	0.30	\$270.00
12/18/2023	Jesse Bair	Edit and finalize Burns Bair's first monthly fee submission (.2); correspondence with G. Brown re same (.1);	0.30	\$270.00

**Totals for Fee Applications 3.40 \$2,780.00**

### Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/1/2023	Jesse Bair	Provide instructions to B. Cawley re recent case insurance developments and abstention research in connection with same (.1);	0.10	\$90.00
12/1/2023	Jesse Bair	Review J. Stang correspondence re potential mediators (.1);	0.10	\$90.00
12/3/2023	Jesse Bair	Review B. Michael correspondence re proof of claim issues (.1);	0.10	\$90.00
12/4/2023	Timothy Burns	Review correspondence with B. Michael and J. Bair re Debtor insurance policies (.1); consideration of issues re Debtor insurance program (.1);	0.20	\$224.00
12/4/2023	Jesse Bair	Review final version of proposed Order granting motion to lift the stay re the Castro personal injury action (.1); correspondence with the Debtor and Castro counsel re same (.1);	0.20	\$180.00
12/4/2023	Jesse Bair	Correspondence with B. Michael re production of Debtor insurance materials (.1);	0.10	\$90.00
12/4/2023	Jesse Bair	Review B. Michael correspondence re recent case developments and next-steps (.1);	0.10	\$90.00
12/5/2023	Brian Cawley	Continue detailed analysis re abstention and jurisdictional issues involving the Chubb coverage action, including assessment of mandatory abstention and forum defendant rule (3.0); draft memorandum summarizing research results re same (.8);	3.80	\$2,090.00
12/5/2023	Timothy Burns	Review B. Michael correspondence re status of discovery and mediation update (.1);	0.10	\$112.00
12/6/2023	Brian Cawley	Complete research on abstention issue in connection with the Chubb coverage action (.5); finish drafting summary of research for partner review (.7);	1.20	\$660.00
12/6/2023	Jesse Bair	Review and consider notice of continuance of certain insurers' motion to lift the stay (.1); correspondence with T. Burns re same (.1);	0.20	\$180.00

12/7/2023	Timothy Burns	Review certain insurers' lift stay continuance motion (.1); correspondence with PSZJ re same (.1);	0.20	\$224.00
12/7/2023	Timothy Burns	Review Order re Castro relief from stay motion (.1);	0.10	\$112.00
12/7/2023	Timothy Burns	Review and respond to correspondence from PSZJ re insurance lift stay and removal issues (.2);	0.20	\$224.00
12/7/2023	Timothy Burns	Participate in conference with PSZJ and J. Bair re certain insurers' lift stay motion, potential resolution of same, and overall case insurance issues with the Debtor (.3);	0.30	\$336.00
12/7/2023	Jesse Bair	Review correspondence with B. Michael and T. Burns re issues in connection with certain insurers' lift stay motion (.1);	0.10	\$90.00
12/7/2023	Jesse Bair	Participate in conference with PSZJ and T. Burns re certain insurers' lift stay motion, potential resolution of same, and overall case insurance issues with the Debtor (.3);	0.30	\$270.00
12/8/2023	Jesse Bair	Review correspondence from the Debtor re call to discuss case insurance issues (.1);	0.10	\$90.00
12/9/2023	Jesse Bair	Review additional correspondence with the debtor and T. Burns re call to discuss case insurance issues (.1);	0.10	\$90.00
12/10/2023	Jesse Bair	Review correspondence from the Debtor re recent insurance document production (.1); correspondence with BB team re same (.1);	0.20	\$180.00
12/11/2023	Brian Cawley	Begin analyzing newly produced Debtor insurance documents (1.9); conference with J. Bair re review of same (.1);	2.00	\$1,100.00
12/11/2023	Timothy Burns	Review B. Michael correspondence re case discovery issues (.1);	0.10	\$112.00
12/11/2023	Alyssa Turgeon	Begin assisting with review of recently produced debtor insurance policies (1.3);	1.30	\$442.00
12/11/2023	Jesse Bair	Review B. Cawley research memo re abstention issues in connection with certain insurers' motion to lift the stay (.1);	0.10	\$90.00
12/11/2023	Jesse Bair	Additional review of B. Cawley research memo re mechanisms for creating comprehensive insurance coverage action in connection with certain insurers' motion to lift the stay (.1);	0.10	\$90.00
12/11/2023	Jesse Bair	Participate in conference with B. Cawley re contents of recent Debtor insurance document production (.1);	0.10	\$90.00
12/11/2023	Jesse Bair	Review Debtor correspondence re upcoming insurance meeting with the Debtor (.1);	0.10	\$90.00
12/12/2023	Jesse Bair	Review B. Michael correspondence re case developments, discovery status, and Rule 2004 issues (.1);	0.10	\$90.00

12/12/2023	Alyssa Turgeon	Continue assisting with review of recently produced debtor insurance policies (1.0);	1.00	\$340.00
12/13/2023	Jesse Bair	Prepare for case insurance meeting with the Debtor (.1);	0.10	\$90.00
12/13/2023	Jesse Bair	Participate in case insurance meeting with the Debtor, PSZJ, and T. Burns (.8);	0.80	\$720.00
12/13/2023	Jesse Bair	Participate in post-meeting call with PSZJ and T. Burns re outcome of insurance meeting with the Debtor and next-steps re case insurance issues (.2);	0.20	\$180.00
12/13/2023	Jesse Bair	Participate in conference with T. Burns re next-steps re case insurance strategy (.1);	0.10	\$90.00
12/13/2023	Timothy Burns	Participate in post-meeting call with PSZJ and J. Bair re outcome of insurance meeting with the Debtor and next-steps re case insurance issues (.2); participate in call with J. Bair re next-steps re case insurance strategy (.1); participate in call with state court counsel re case insurance strategy (.2);	0.50	\$560.00
12/13/2023	Timothy Burns	Prepare for insurance meeting with the Debtor (.1); participate in case insurance meeting with the Debtor, PSZJ, and J. Bair (.8);	0.90	\$1,008.00
12/15/2023	Jesse Bair	Review the Committee's second status report re its Rule 2004 application to the Debtor (.2);	0.20	\$180.00
12/15/2023	Jesse Bair	Review J. Stang correspondence re revised protective order (.1);	0.10	\$90.00
12/15/2023	Brian Cawley	Participate in conference with J. Bair re work needed re Diocesan coverage chart / policy review project (.2);	0.20	\$110.00
12/15/2023	Brian Cawley	Continue analyzing historical Diocesan insurance coverage documents in connection with Diocesan coverage chart project (1.7);	1.70	\$935.00
12/15/2023	Jesse Bair	Provide instructions to B. Cawley re work needed re Diocesan coverage chart / policy review project (.2);	0.20	\$180.00
12/18/2023	Jesse Bair	Review correspondence re recent production of insurance secondary evidence from the Debtor (.1);	0.10	\$90.00
12/18/2023	Jesse Bair	Correspondence with G. Brown re Burns Bair pro hac vice submissions (.1);	0.10	\$90.00
12/18/2023	Brian Cawley	Begin drafting debtor insurance coverage chart based on insurance documents received (3.4);	3.40	\$1,870.00
12/19/2023	Jesse Bair	Correspondence with K. Dempski re recent debtor document production (.1); correspondence with G. Brown re same (.1);	0.20	\$180.00

12/19/2023	Karen Dempski	Download/upload secondary evidence of insurance policies (.2);	0.20	\$68.00
12/20/2023	Jesse Bair	Provide instructions to B. Cawley re recent Debtor insurance document production and review of same (.1);	0.10	\$90.00
12/20/2023	Alyssa Turgeon	Continue assisting with review of recently produced debtor historical insurance materials (4.0);	4.00	\$1,360.00
12/21/2023	Alyssa Turgeon	Continue assisting with review of recently produced debtor historical insurance materials (1.5);	1.50	\$510.00
12/21/2023	Brian Cawley	Analyze newly produced historical Diocesan insurance coverage materials, including secondary evidence, in connection with Diocesan coverage chart project (2.2);	2.20	\$1,210.00
12/22/2023	Timothy Burns	Developed mediation strategy re insurers and potential plan provisions (1.0);	1.00	\$1,120.00
12/22/2023	Jesse Bair	Participate in conference with B. Cawley re status of Debtor insurance document review project (.2);	0.20	\$180.00
12/22/2023	Jesse Bair	Review and edit Burns Bair pro hac vice submissions (.1); correspondence with PSZJ re same (.1);	0.20	\$180.00
12/22/2023	Brian Cawley	Discuss status of insurance coverage review project with J. Bair (.2);	0.20	\$110.00
12/22/2023	Brian Cawley	Continue analyzing newly produced historical Diocesan insurance coverage materials, including secondary evidence, in connection with Diocesan coverage chart project (4.4);	4.40	\$2,420.00
12/24/2023	Timothy Burns	Review B. Michael correspondence re 2004 Order and Protective Order and related attachments (.2);	0.20	\$224.00
12/24/2023	Timothy Burns	Respond to PSZJ correspondence re debtor document productions (.1);	0.10	\$112.00
12/26/2023	Brian Cawley	Continue analyzing newly produced historical Diocesan insurance coverage materials, including secondary evidence, in connection with Diocesan coverage chart project (2.3);	2.30	\$1,265.00
12/26/2023	Brenda Horn-Edwards	Edit pro hac vice application for T. Burns (.1); file application and proposed order in CM/ECF (.1);	0.20	\$68.00
12/26/2023	Brenda Horn-Edwards	Edit pro hac vice application for J. Bair (.1); file application and proposed order in CM/ECF (.1); correspond with J. Bair re same (.1);	0.30	\$102.00

12/27/2023	Brian Cawley	Continue analyzing newly produced historical Diocesan insurance coverage materials, including secondary evidence, in connection with Diocesan coverage chart project (4.3);	4.30	\$2,365.00
12/28/2023	Brian Cawley	Continue drafting debtor insurance coverage chart based on insurance documents received (2.1);	2.10	\$1,155.00
12/28/2023	Brian Cawley	Finalize debtor coverage chart for partner review (1.2);	1.20	\$660.00
12/28/2023	Brian Cawley	Draft summary of coverage chart and notable points for T. Burns and J. Bair (.7);	0.70	\$385.00
<b>Totals for Insurance Recovery Activities</b>			<b>46.90</b>	<b>\$27,913.00</b>

<b>Total Hours and Fees</b>	<b>51.20</b>	<b>\$31,591.00</b>
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### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
12/26/2023	Pro hac vice application filing fee for T. Burns	\$328.00
12/26/2023	Pro hac vice application filing fee for J. Bair	\$328.00
<b>Total Expenses</b>		<b>\$656.00</b>

### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	Paralegal	7.80	\$340.00	\$2,652.00
Brenda Horn-Edwards	Paralegal	0.50	\$340.00	\$170.00
Brian Cawley	Associate	29.70	\$550.00	\$16,335.00
Jesse Bair	Partner	8.20	\$900.00	\$7,380.00
Karen Dempski	Paralegal	0.70	\$340.00	\$238.00
Timothy Burns	Partner	4.30	\$1,120.00	\$4,816.00

**Total Due This Invoice: \$32,247.00**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
Archbishop of San Francisco**

**Issue Date :** 2/5/2024

**Bill # :** 01367

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
1/10/2024	Jesse Bair	Review B. Michael correspondence re agenda for upcoming Committee meeting and case developments (.1);	0.10	\$90.00
1/19/2024	Jesse Bair	Prepare for state court counsel meeting re potential case insurance strategies (.1);	0.10	\$90.00
1/19/2024	Jesse Bair	Participate in state court counsel meeting re potential case insurance strategies (1.2);	1.20	\$1,080.00
<b>Totals for Committee Meetings</b>			<b>1.40</b>	<b>\$1,260.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
1/9/2024	Jesse Bair	Review and edit Burns Bair invoice for inclusion with monthly fee submission (1.0); correspondence with B. Horn re same (.1);	1.10	\$990.00
1/10/2024	Jesse Bair	Correspondence with the Committee re Burns Bair's monthly fee submission (.1);	0.10	\$90.00
1/14/2024	Jesse Bair	Correspondence with G. Brown re first round of interim fee applications (.1);	0.10	\$90.00
1/16/2024	Jesse Bair	Correspondence with G. Brown and BRG re first round of interim fee applications (.1);	0.10	\$90.00
1/16/2024	Brenda Horn-Edwards	Draft monthly Burns Bair professional fee statement (.3); correspond with J. Bair re same (.1);	0.40	\$136.00
1/18/2024	Jesse Bair	Review and edit Burns Bair monthly fee submission (.1); review and respond to correspondence with PSZJ re same (.2);	0.30	\$270.00
1/19/2024	Timothy Burns	Review fee examiner order (.1);	0.10	\$112.00
<b>Totals for Fee Applications</b>			<b>2.20</b>	<b>\$1,778.00</b>



**Insurance Recovery Activities**

<b><u>Date</u></b>	<b><u>Timekeeper</u></b>	<b><u>Narrative</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
1/2/2024	Jesse Bair	Review J. Stang correspondence re potential mediators and debtor position re same (.1);	0.10	\$90.00
1/2/2024	Jesse Bair	Participate in call with J. Stang and T. Burns re potential test case strategy (.3);	0.30	\$270.00
1/2/2024	Timothy Burns	Participate in call with J. Stang and J. Bair re potential test case strategy (.3);	0.30	\$336.00
1/3/2024	Jesse Bair	Review third notice of continuance of certain insurers' motion to lift the stay (.1);	0.10	\$90.00
1/4/2024	Jesse Bair	Brief analysis of insurance issues in connection with potential test case strategy (.1);	0.10	\$90.00
1/4/2024	Timothy Burns	Participate in additional call with J. Stang re insurance case strategy (.3); brief analysis re status of underlying lawsuits prior to bankruptcy in connection with potential test cases (.1);	0.40	\$448.00
1/4/2024	Jesse Bair	Review correspondence with the Debtor and PSZJ re recent debtor document productions (.1);	0.10	\$90.00
1/5/2024	Karen Dempski	Download/upload DEBTOR004 production documents (.5);	0.50	\$170.00
1/7/2024	Timothy Burns	Review Committee coverage chart prepared by B. Cawley (.2);	0.20	\$224.00
1/8/2024	Jesse Bair	Review correspondence with PSZJ re state court counsel meeting and potential insurance demands (.1);	0.10	\$90.00
1/9/2024	Jesse Bair	Brief review re current version of the Committee's Rule 2004 subpoena on the Debtor (.1); review correspondence with A. Cain and the Debtor re same and Debtor discovery issues (.1);	0.20	\$180.00
1/9/2024	Jesse Bair	Brief review re Debtor coverage chart prepared by B. Cawley (.1);	0.10	\$90.00
1/9/2024	Timothy Burns	Review correspondence with the debtor and PSZJ re Rule 2004 subpoena (.1);	0.10	\$112.00
1/15/2024	Jesse Bair	Review correspondence with B. Michael and state court counsel re upcoming state court counsel meeting (.1);	0.10	\$90.00
1/15/2024	Jesse Bair	Review correspondence with PSZJ and the Debtor re discovery production issues and proposed weekly call re discovery issues (.1);	0.10	\$90.00
1/17/2024	Jesse Bair	Review case protective order (.2); review and execute agreement to be bound by same (.1);	0.30	\$270.00



1/17/2024	Jesse Bair	Review and execute bar date confidentiality order (.1); correspond with B. Michael re same (.1);	0.20	\$180.00
1/18/2024	Timothy Burns	Participate in call with state court counsel re case insurance strategy (.1);	0.10	\$112.00
1/18/2024	Jesse Bair	Continued analysis re issues in connection with potential insurance demands and/or test cases (.1);	0.10	\$90.00
1/19/2024	Jesse Bair	Correspondence with the Debtor re Debtor coverage chart (.1);	0.10	\$90.00
1/19/2024	Jesse Bair	Review and respond to correspondence with state court counsel re insurance demand letter issues (.2);	0.20	\$180.00
1/21/2024	Jesse Bair	Review fourth notice of continuance re certain insurers' motion to lift the stay (.1);	0.10	\$90.00
1/22/2024	Jesse Bair	Review correspondence with the Debtor re case discovery meeting (.1);	0.10	\$90.00
1/23/2024	Timothy Burns	Review correspondence with the Debtor and PSZJ re discovery meeting and current production status (.2);	0.20	\$224.00
1/24/2024	Brian Cawley	Draft revised version of Committee coverage chart to incorporate suggested partner edits (.7);	0.70	\$385.00
1/24/2024	Jesse Bair	Analysis regarding the Debtor's insurance coverage program in connection with potential test cases (.4);	0.40	\$360.00
1/24/2024	Jesse Bair	Draft email memorandum to state court counsel re potential test case issues (.2);	0.20	\$180.00
1/24/2024	Jesse Bair	Correspondence with B. Cawley re Debtor excess coverage in the 1980s (.1);	0.10	\$90.00
1/25/2024	Jesse Bair	Review B. Michael correspondence re case update and discovery issues (.1);	0.10	\$90.00
1/27/2024	Timothy Burns	Review Debtor correspondence re document production issues (.1);	0.10	\$112.00
1/27/2024	Karen Dempksi	Download/upload recent Debtor document production (.4);	0.40	\$136.00
1/28/2024	Jesse Bair	Analysis re the Westchester Excess policies (.1); correspondence with the Debtor re same (.1);	0.20	\$180.00
1/28/2024	Jesse Bair	Review correspondence from the debtor re recent document productions (.1);	0.10	\$90.00
1/28/2024	Jesse Bair	Review the debtor's responses and objections to the Committee's stage one Rule 2004 examination (.2);	0.20	\$180.00
1/30/2024	Brian Cawley	Compare draft Committee coverage chart with debtor's version and begin drafting summary of differences (1.7);	1.70	\$935.00
1/30/2024	Brian Cawley	Analyze historical policy documentation to determine accuracy of current version of debtor coverage chart (1.0);	1.00	\$550.00

1/30/2024	Jesse Bair	Review the debtor's draft coverage chart (.1); correspondence with the Debtor re same and related secondary evidence (.1);	0.20	\$180.00
1/30/2024	Jesse Bair	Review correspondence with the Diocese and PSZJ re case discovery issues (.1);	0.10	\$90.00
1/30/2024	Jesse Bair	Correspondence with B. Cawley re analysis needed re discrepancies between the debtor and committee coverage charts (.1);	0.10	\$90.00
1/31/2024	Timothy Burns	Participate in call with J. Stang and B. Michael re ongoing insurance projects and strategy (.1); correspond with J. Bair re same (.1);	0.20	\$224.00
1/31/2024	Timothy Burns	Review correspondence with PSZJ and debtor re document production matters (.1);	0.10	\$112.00
<b>Totals for Insurance Recovery Activities</b>			<b>10.10</b>	<b>\$7,770.00</b>
<b>Total Hours and Fees</b>			<b>13.70</b>	<b>\$10,808.00</b>

#### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
01/01/2024	Fourth Quarter 2023 PACER	\$49.30
<b>Total Expenses</b>		<b>\$49.30</b>

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	0.40	\$340.00	\$136.00
Brian Cawley	Associate	3.40	\$550.00	\$1,870.00
Jesse Bair	Partner	7.20	\$900.00	\$6,480.00
Karen Dempski	Paralegal	0.90	\$340.00	\$306.00
Timothy Burns	Partner	1.80	\$1,120.00	\$2,016.00

**Total Due This Invoice: \$10,857.30**